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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
[Northern District-Reno]

10 RONALD E. FREETO

11 Plaintiff,
12 vs.

13 LIME FINANCIAL SERVICES, LTD, a Oregon
14 corporation; STEWART TITLE OF
15 NORTHERN NEVADA; MERSCORP, INC. a
16 Virginia corporation, MORTGAGE
17 ELECTRONIC REGISTRATION SYSTEM,
18 INC., a subsidiary of MERSCORP, INC., a
19 Delaware corporation, [MERS]; QUALITY
20 LOAN SERVICE CORPORATION; LITTON
LOAN SERVICING LP; WILMINGTON TRUST
COMPANY; BANK OF NEW YORK;
JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION; C-BASS MORTGAGE LOAN
ASSET BACKED CERTIFICATES, SERIES
2005-CB4; and
DOES 1-25 CORPORATIONS, DOES and
ROES 1-25 Individuals, [Partnerships, or
anyone claiming any interest to the property
described in the action.

Case # 3:09-cv-00754-LRH-VPC

NOTICE OF INTENT
TO WITHHOLD
RESPONSE TO DEFENDANT LIME
FINANCIAL SERVICES, LTD'S
PENDING MOTION TO DISMISS
OR IN THE ALTERNATIVE MOTION
FOR SUMMARY JUDGMENT

22 Defendants.
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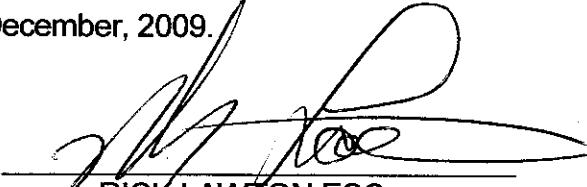
24 COMES NOW, Plaintiff(s) RONALD E. FREETO, by and through their counsel of
25 record, LAW OFFICE OF RICK LAWTON ESQUIRE, PROF COPR. RICK LAWTON ESQ.,
26 and provides notice of the intent to withhold responses to Defendants Lime Financial

1 Services LTD'S [4] Motion to Dismiss or in the alternative motion for summary judgment
2 filed in Federal Court, on December 28, 2009, pending a ruling on Plaintiffs Motion for
3 Remand , filed contemporaneously herewith, regarding whether plaintiffs may try the
4 matter in the County and State Court where the property is located.

5 Plaintiff has asserted only state law violations and common law causes of
6 actions. The action involves quieting title as well as other equitable remedies and
7 should be heard in State Court.

8 State Court Judges have evaluated similar complaints and found merit in the
9 complaints and likelihood of Plaintiff's prevailing in order to issue ex parte restraining
10 orders. [SEE: Exhibit A through J, attached.]

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12 DATED: This 39th day of December, 2009.
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RICK LAWTON ESQ.
SBN 00694

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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on December 30, 2009, I electronically filed the
5 foregoing
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8 **NOTICE OF INTENT
TO WITHHOLD
RESPONSE TO PENDING MOTION TO DISMISS**
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10
11 using the CM/ECF system which will send a notice of electronic filing to all parties
12 as listed on the Notice of Electronic Filing.
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11 /s/ Lavinia Johnson
12 Lavinia Johnston
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